

FILED
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US DISTRICT COURT E.D.N.Y.

★ JUN 05 2019 ★

MPR:FJN/TAW
F. #2018R00317

BROOKLYN OFFICE

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

----- X

UNITED STATES OF AMERICA

- against -

STEVEN BYNUM,

Defendant.

----- X

THE GRAND JURY CHARGES:

I N D I C T M E N T

CR 19 00255

Cr. No. _____
(T. 18, U.S.C., §§ 36(b)(1),
924(c)(1)(A)(i), 924(c)(1)(A)(ii),
924(c)(1)(A)(iii), 924(d)(1), 2 and 3551
et seq.; T. 21, U.S.C., § 853(p); T. 28,
U.S.C., § 2461(c))

MAUSKOPF, J.

LEVY, M.J.

COUNT ONE
(Drive-by Shooting)

1. On or about September 10, 2017, within the Eastern District of New York, the defendant STEVEN BYNUM, together with others, in furtherance of a major drug offense, to wit: a conspiracy to distribute one or more controlled substances, which offense involved heroin, a Schedule I controlled substance, and cocaine, a Schedule II controlled substance, punishable under Title 21, United States Code, Section 846, with the intent to intimidate, harass, injure and maim, did knowingly and intentionally fire a weapon into a group of two or more persons and, in the course of such conduct, caused grave risk to human life.

(Title 18, United States Code, Sections 36(b)(1), 2 and 3551 et seq.)

COUNT TWO

(Possessing, Brandishing and Discharging a Firearm During a Crime of Violence)

2. On or about September 10, 2017, within the Eastern District of New York, the defendant STEVEN BYNUM, together with others, did knowingly and intentionally use and carry one or more firearms during and in relation to a crime of violence, to wit: the crime charged in Count One, and did knowingly and intentionally possess such firearms in furtherance of said crime of violence, one or more of which firearms was brandished and discharged.

(Title 18, United States Code, Sections 924(c)(1)(A)(i), 924(c)(1)(A)(ii), 924(c)(1)(A)(iii), 2 and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION
AS TO COUNT TWO

3. The United States hereby gives notice to the defendant that, upon his conviction of the offense charged in Count Two, the government will seek forfeiture in accordance with Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c), which require the forfeiture of any firearm or ammunition involved in or used in any knowing violation of Title 18, United States Code, Sections 922 or 924.

4. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or

(e) has been commingled with other property which cannot be divided without difficulty;

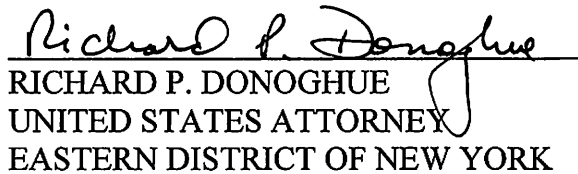
it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Section 924(d)(1); Title 21, United States Code, Section 853(p); Title 28, United States Code, Section 2461(c))

A TRUE BILL

A handwritten signature in black ink, appearing to read "Ahmed", is written over a horizontal line.

FOREPERSON

A handwritten signature in black ink, appearing to read "Richard P. Donoghue", is written over a horizontal line.
RICHARD P. DONOGHUE
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

F #: 2018R00317
FORM DBD-34
JUN. 85

No.

UNITED STATES DISTRICT COURT

EASTERN District of NEW YORK

CRIMINAL DIVISION

THE UNITED STATES OF AMERICA

vs.

STEVEN BYNUM,

Defendant.

INDICTMENT

T. 18, U.S.C., §§ 36(b)(1), 924(c)(1)(A)(i), 924(c)(1)(A)(ii),
924(c)(1)(A)(iii) 924(d)(1), 2 and 3551 et seq.; T. 21, U.S.C., § 853(p);
T. 28, U.S.C., § 2461(c))

A true bill.



Foreperson

Filed in open court this _____ day,
of _____ A.D. 20 _____

Clerk

Bail, \$ _____

Temidayo Aganga-Williams, Assistant United States Attorney (718) 254-6183